

I. Overview

What is the Community Relations Plan?

The Community Relations Plan outlines public involvement programs of the U.S. Department of Energy to inform and involve the public in the remediation decision-making process under the Comprehensive Environmental Response, Compensation and Liability Act. The Community Relations Plan is intended to be a guide for the public on opportunities to get involved in the CERCLA remediation program at the INEEL. Remediation is a risk-based cleanup approach used for contaminated soil and water.

This document is a revision to the 1995 Community Relations Plan. The 1995 document was developed with the help of a focus group of citizens with diverse interests in cleanup activities.

The establishment of a Citizens Advisory Board, public comment on future land-use scenarios, criteria for prioritizing cleanup projects, and an environmental impact statement for INEEL site activities have also influenced public participation in the cleanup process.



Contaminated soil is removed from a site at the Central Facilities Area.

Community Relations Plan

This plan was developed according to the EPA guidance document, *Community Relations in Superfund: A Handbook*, January 1992. The INEEL Information Repository contains a copy of the guidance (see Appendix C, page 30, for repository locations.)

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), CERCLA also known as the Superfund law, is a federal statute enacted in 1980 and reauthorized in 1986. It provides the authority for cleanup of hazardous substances that could endanger public health, public welfare, or the environment.

National Priorities List

This is EPA's list of hazardous waste sites that require investigation and cleanup under the federal Superfund program.

Citizens are always welcome to comment on public participation activities by writing or calling the INEEL Community Relations Plan Coordinator, P.O. Box 1625, Idaho Falls, ID 83415-3940 at (208) 526-3183 or at (800) 708-2680.

Interested citizens may:

- Receive mailings (fact sheets, proposed plans, records of decision and postcard notices)
- Visit the INEEL website at <http://cleanup.inel.gov>
- Visit the INEEL Information Repository/Administrative Record collections (see Appendix C, page 30, for locations)
- Attend public meetings, open houses, workshops and briefings
- Submit oral or written comments during public comment periods
- Provide public input on feasibility study alternatives, remedial design and action phases, and revisions to the Community Relations Plan

Why is the plan needed?

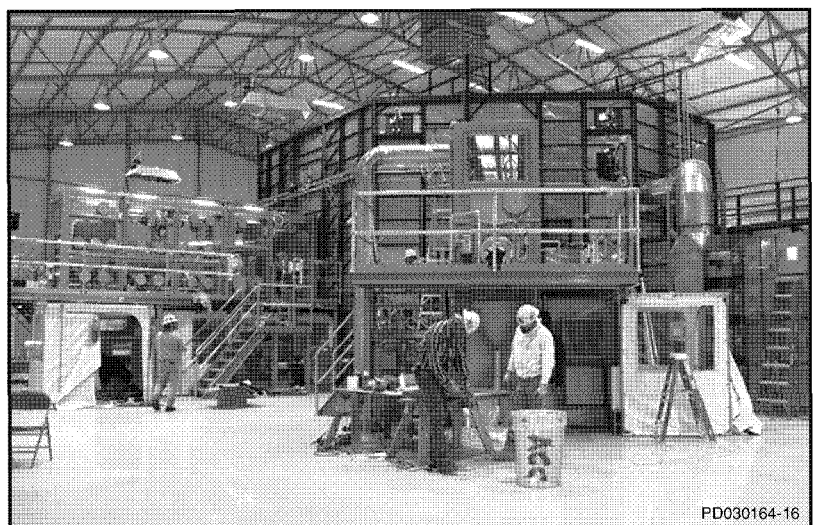
The INEEL is a National Priority List (Superfund) site under CERCLA due to confirmed releases of contaminants to the groundwater. DOE entered into a Federal Facility Agreement and Consent Order (FFA/CO) in 1991 with the EPA and the state of Idaho. This agreement provides the process for making remediation decisions for the INEEL.

A Community Relations Plan must be developed for every National Priorities List site. The FFA/CO reaffirms this requirement. This Community Relations Plan fulfills the requirement to provide the public with a description of how information about CERCLA remediation can be accessed and how a citizen can be involved in the decision-making process.

In accordance with CERCLA requirements, DOE has been:

- 1) Investigating areas suspected of being contaminated
- 2) Identifying solutions for cleanup
- 3) Involving the public in the investigation and decision-making process
- 4) Obtaining concurrence from state and approval from EPA for federal facility remedial actions
- 5) Implementing the best course of action
- 6) Monitoring and maintaining completed remedial actions

The Community Relations Plan is just one part of a wider public involvement effort for cleanup work at the INEEL managed under the Idaho Completion Project. This work is done to meet the



Workers put the finishing touches on the Glovebox Excavator Method facility at Pit 9 prior to beginning excavation in the pit at the Radioactive Waste Management Complex.

requirements of many laws in addition to CERCLA – The Resource Conservation and Recovery Act (RCRA), the National Environmental Policy Act (NEPA), the Clean Air Act and other legislation also direct cleanup at the INEEL.

Besides the FFA/CO, which provides the framework for remediation of soil and water contamination from past INEEL missions, DOE is also party to the 1995 Settlement Agreement with the state of Idaho and the U.S. Navy, as well as several consent orders – binding agreements with the state of Idaho to ensure INEEL facilities are brought into compliance with RCRA regulations.

DOE has recently separated the management of the INEEL into two distinct functions. The name Idaho National Laboratory has been assigned to the function focused on research and development as well as development of future missions including nuclear energy.

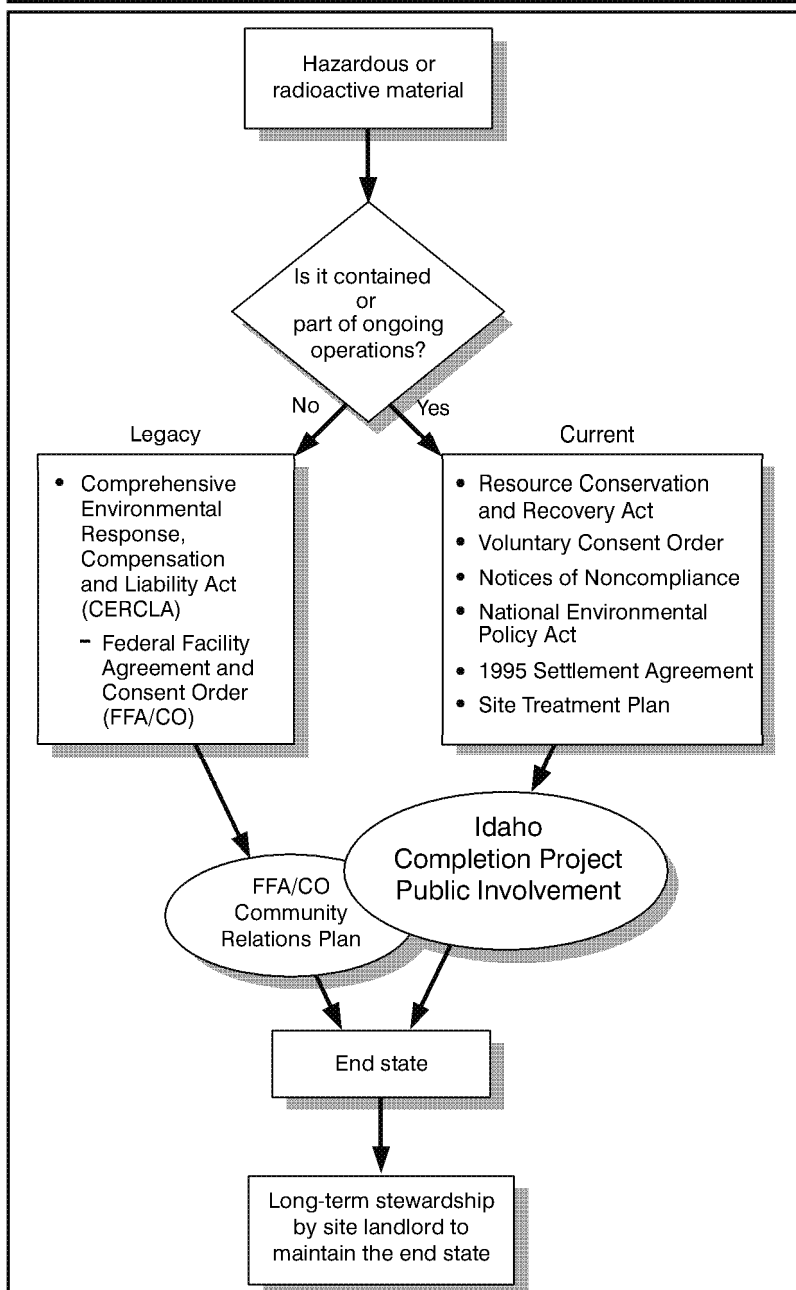
The remaining cleanup function of the site and long-term management of spent nuclear fuel is now called the Idaho Cleanup Project. This function has the responsibility to meet DOE's legal agreements and cleanup milestones.

Objectives of the Community Relations Plan

- Describe different methods of public participation and how citizens can become involved in key decisions during the CERCLA remediation process
- Identify public concerns and address differing points of view on health and environmental issues, credibility, written materials and involvement activities

Citizens are invited to identify their concerns and offer suggestions to improve the Community Relations printed material and

What is the relationship between CERCLA remediation and other environmental cleanup?



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This chart illustrates why a particular cleanup site would be handled under CERCLA or under other environmental laws or agreements. Generally, if the contaminated material is not contained, is not part of ongoing operations, or is a result of operations in the past, it falls under CERCLA. This is a very simplified representation -- usually more than one law or agreement applies to a cleanup project and steps must be taken to ensure all legal requirements are met.

Waste Types at the INEEL

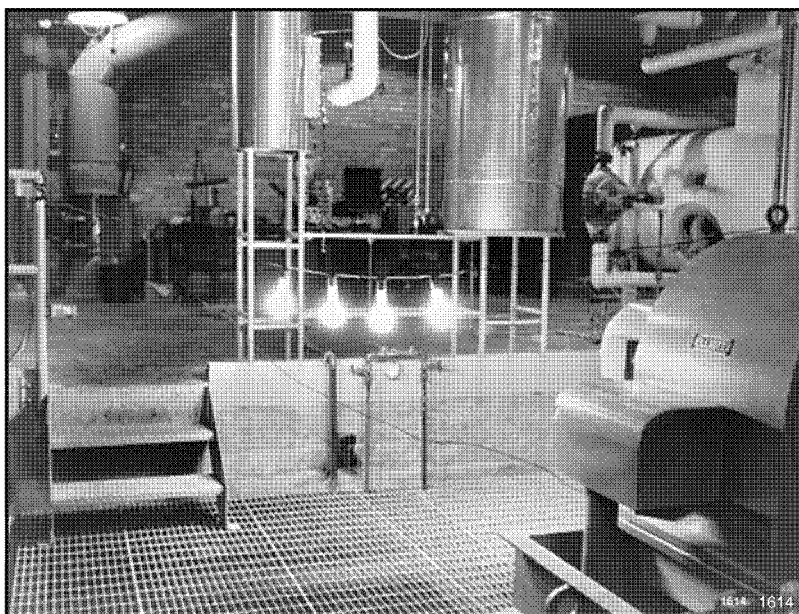
- **Industrial waste** – solid sanitary wastes which aren't hazardous or radioactive, like paper, cardboard and wood, similar to waste found in municipal landfills.
- **Hazardous waste** – includes items such as heavy metals and industrial solvents like carbon tetrachloride and PCB waste.
- **Radioactive waste** – includes unusable materials contaminated with radioactive particles that emit ionizing radiation (energy) and are further characterized as:
 - **Transuranic waste**, emitting alpha particles, having an atomic weight greater than uranium, a half-life greater than 20 years, and a concentration exceeding 100 nanocuries per gram.
 - **Alpha low-level waste**, emitting alpha particles, and having a concentration of transuranic elements over 10 but below 100 nanocuries per gram.
 - **High-level waste**, highly radioactive waste resulting from the reprocessing of spent nuclear fuel, including liquid waste produced directly from processing and any solid material derived from such liquid waste.
 - **Low-level waste** does not meet the definitions for high-level, transuranic, spent nuclear fuel or by-product materials.
- **Mixed waste** – includes unusable materials that contain both hazardous and radioactive contaminants.

public meetings to better meet their needs. To make these suggestions, contact the INEEL's Community Relations Plan coordinator. Contact information is listed in Appendix C of this plan (page 30).

II. Shifting the focus to completion

The investigation phase of contaminated and potentially contaminated sites at the INEEL is coming to a close. Of the many site investigations originally identified, only a few remain. The remaining investigations are by far the most complex and have been the focus of most stakeholder comments and concerns over the years. These include completion of the investigation for the Subsurface Disposal Area and High-Level Waste Tank Farm, as well as final integration of all information available on contamination of the Snake River Plain Aquifer. Small areas of contamination continue to be identified as buildings are removed. These areas are listed as new sites under the FFA/CO.

The records of decision for all other remediation projects at the INEEL site have been signed, and the remediation activities have either been completed or are currently ongoing. At the end of 2003, remediation to meet ROD requirements had been completed for the BORAX reactor area, the Test Reactor Area and the Central Facilities Area. Remediation of the Argonne National Laboratory-West area, Power Burst Facility, and Auxiliary Reactor Area is planned to be complete in 2004. Remediation of the Test Area North will be completed in 2007.



Electricity was generated from nuclear power for the first time on Dec. 20, 1951 at the Experimental Breeder Reactor-I which is now a National Historic Landmark.

Accelerated cleanup

In May 2002, DOE, the Idaho Department of Environmental Quality, and the EPA Region 10 signed a letter of intent formalizing an agreement to pursue accelerated risk reduction and cleanup at the INEEL. The letter provides the foundation for a collaborative plan for completing the majority of the cleanup at the INEEL by 2012. This acceleration includes completion of waste management activities, including treatment and transport of transuranic waste to the Waste Isolation Pilot Plant in Carlsbad, New Mexico, and placing all spent nuclear fuel in dry storage as well as completion of CERCLA remediation.

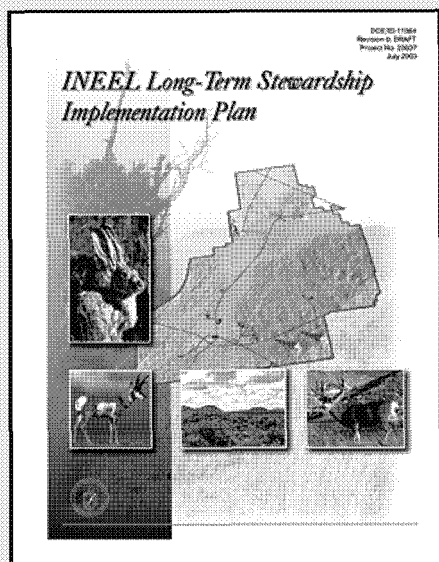
The DOE's Idaho Operations Office developed a Performance Management Plan to propose a significantly improved approach to our cleanup mission and the way we do business.

The vision for accelerating cleanup of the INEEL results in two objectives: 1) risk reduction and continued protection of the Snake River Plain Aquifer, and 2) consolidation of environmental management activities and reinvestment of savings into additional cleanup.



Workers suit up prior to investigating a cleanup site north of the Idaho Nuclear Technology and Engineering Center.

In the summer of 2003, the INEEL asked for input on implementing goals and objectives outlined in the INEEL Long-Term Stewardship Implementation Plan. The INEEL incorporated the comments into a final version of that plan, which was posted on the INEEL web page at <http://cleanup.inel.gov/stewardship>.



What happens after cleanup work is completed?

The INEEL is continuing to develop its Long-Term Stewardship Program. Long-term stewardship refers to all activities necessary to ensure protection of human health and the environment following completion of active remediation, which may include waste removal and disposal, or stabilization of a site or a portion of a site.

The Long-Term Stewardship Program is responsible for maintaining the end state of cleanup sites that are no longer in use. In the case of CERCLA remediation sites, it means continuing to operate long-term remediation systems like aquifer pump-and-treatment operations and maintaining and monitoring barriers. CERCLA records of decision often establish institutional controls at some remediation sites. These controls describe land use restrictions that must be maintained until the residual risk reaches specified levels where control is no longer necessary. The Long-Term Stewardship program is responsible for maintaining these institutional controls.

The ongoing bioremediation and pump-and-treat systems at Test Area North are examples of sites where the program has already assumed the responsibility for continuing operation of a CERCLA remedy. The responsibility continues until remediation goals specified in the ROD are met.

The Long-Term Stewardship Program will also take responsibility for maintaining the end state of non-CERCLA cleanup at the INEEL, such as the empty spent nuclear fuel basins.

As cleanup projects are completed, there is a requirement to continue maintenance and monitoring to avoid any activity that could reduce the protectiveness of the remedy. The Long-Term Stewardship Program will ensure that these requirements are met and that institutional controls continue to protect people and the environment long after the cleanup mission is completed. The program will also maintain information about what hazards remain, so that informed decisions about land use and future missions can be made.

The INEEL's Long-Term Stewardship Program will remain after programs and projects are completed and will consolidate long-term monitoring and land-use commitments, manage and monitor residual waste, and maintain responsibility for natural and cultural resources. Creation of the program does NOT change any statutory obligations for the operation, maintenance, monitoring, institutional controls, or post-closure care identified in records of decision, Hazardous Waste Management Act/Resource Conservation and Recovery Act closure plans, or other agreements. Rather, creation of a Long-Term Stewardship Program is a way to implement post-cleanup responsibilities agreed to under a variety of regulations in a more efficient and focused way.

A brief history of cleanup work at the INEEL

Past activities at the INEEL, have resulted in contamination of soil and groundwater. These activities included: nuclear energy research projects for generating electricity, portable power reactors, nuclear-powered aircraft and testing for commercial-type reactors; treatment of high-level liquid waste; spent nuclear fuel storage, processing, and research and development; Navy gunnery testing, naval training and examination of expended fuel from naval reactors; and the storage and disposal of hazardous and radioactive waste.

Some areas that were used for nuclear reactor research contain hazardous, radioactive and mixed waste types. Contaminants include asbestos, petroleum products, acids and bases, radionuclides and heavy metals. Sites where this contamination exists include injection wells, leaching ponds, underground storage tanks, and disposal pits.

Some sites used for spent nuclear fuel storage, processing, and research and development contain contaminants such as organics, asbestos, radionuclides, metals, corrosives, petroleum wastes and mixed wastes. These sites include spills, injection wells, storage areas, pits, tanks, buildings, contaminated soils, and French drains.



A shipment of transuranic waste leaves the Radioactive Waste Management Complex for the Waste Isolation Pilot Plant in Carlsbad, New Mexico.

By any other name...

The name of DOE's Idaho lab has changed many times over the years to reflect the lab's changing missions.

1949 – The Atomic Energy Commission (DOE's predecessor) established the **National Reactor Testing Station**.

1974 – The facility name was changed to **Idaho National Engineering Laboratory**.

1997 – The facility name was changed to **Idaho National Engineering and Environmental Laboratory**.

DOE plans to change the name again to **Idaho National Laboratory** when it awards the new contract for the lab. Cleanup work is being handled separately under the name **Idaho Cleanup Project**.

Snake River Plain Aquifer

An aquifer is a layer of water-saturated rock or soil through which water flows in a quantity useful to people. The Snake River Plain Aquifer flows southwestward from the area around Ashton, Idaho, to around King Hill, Idaho. The aquifer water moves through porous basalt and sedimentary interbeds and surfaces in a series of springs that flow into the Snake River. The Snake River Plain Aquifer and the Snake River are major agricultural, industrial and municipal water sources for southwestern Idaho.

The past storage and disposal of hazardous and radioactive waste at the Radioactive Waste Management Complex, established in 1952, has created a significant amount of concern. Waste generated by operations at the INEEL and other DOE sites, such as the Rocky Flats Plant in Colorado, was disposed here. Contaminants include radioactive, hazardous and mixed waste. The waste was disposed in soil vaults, pits and trenches, and on a waste disposal pad. The burial ground received transuranic waste until 1970 and still receives low-level radioactive waste. Probing in the burial ground has shown that many of the original waste containers are no longer intact. Monitoring is ongoing for contaminant releases to the air, vadose zone (the region from the ground surface down to the aquifer), surface water and groundwater.

Organic compounds exceeding drinking water standards have been detected in the **Snake River Plain Aquifer** near the Radioactive Waste Management Complex and near Test Area North. A cleanup project is currently ongoing to remove and destroy these organic

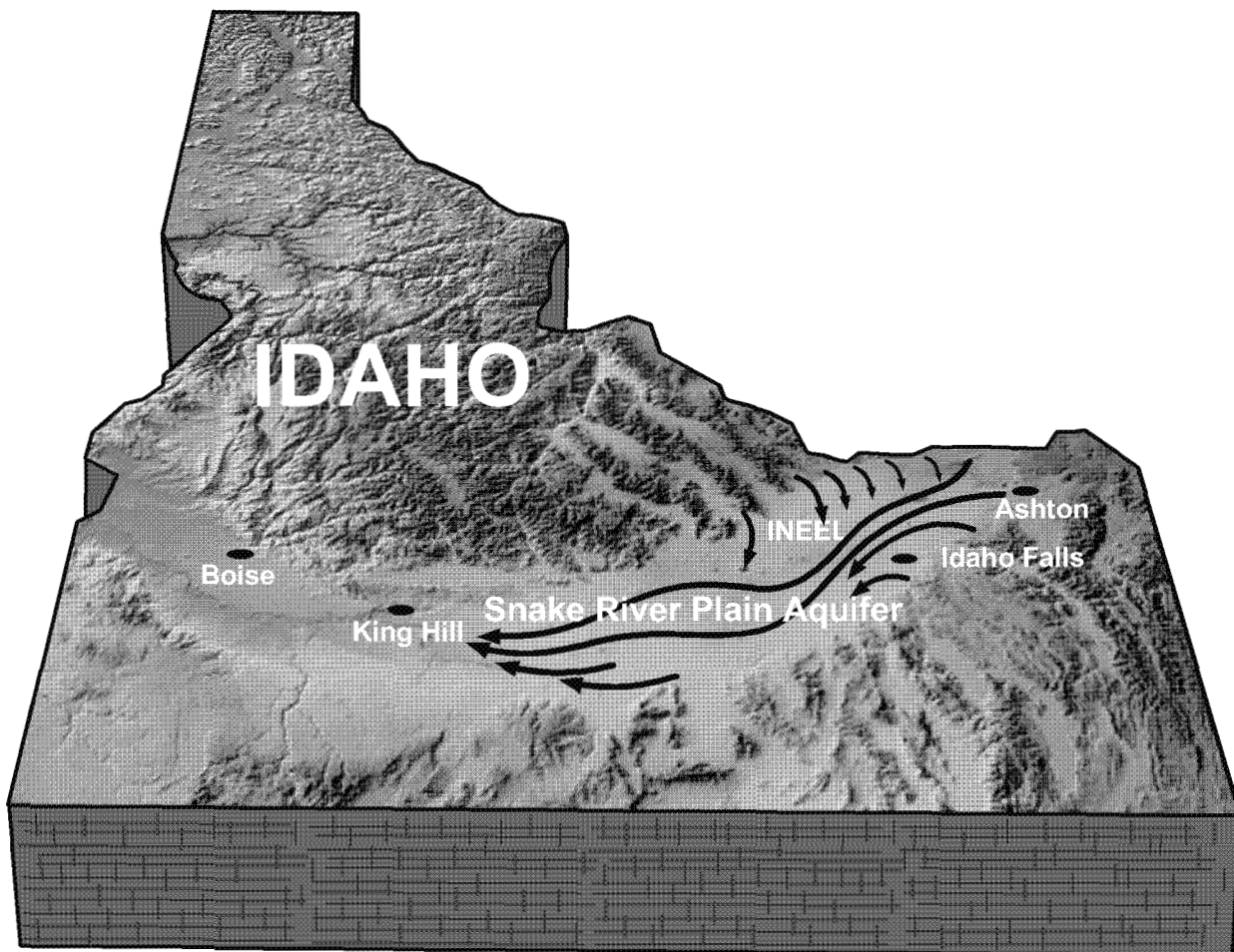


Figure 1. The Snake River Plain Aquifer flows in a southwesterly direction from Ashton to King Hill.

compounds from the ground over the aquifer. In order to independently monitor the groundwater, the state of Idaho INEEL Oversight Program and the U.S. Geological Survey take water samples from wells along the southern boundary of the INEEL. Several new groundwater monitoring wells have been installed near the Radioactive Waste Management Complex and within the Subsurface Disposal Area where the buried waste is located.

Groundwater treatment and/or monitoring is also under way for contaminants at Test Area North, the Test Reactor Area and the Idaho Nuclear Technology and Engineering Center. Several other groundwater monitoring wells, on- and off-site, are also independently monitored. Groundwater monitoring will continue to provide information on contaminant migration for the comprehensive environmental investigation.

Early assessment of the INEEL

In 1987, the DOE, the EPA and the U.S. Geological Survey signed a Consent Order and Compliance Agreement under authority of RCRA. This agreement addressed compliance with regulations governing previous disposal of hazardous waste at the INEEL. The agreement contained a plan designed to achieve and maintain compliance with requirements that address the release or potential release of hazardous components. The plan called for investigation of all sites that may have been used to dispose of hazardous wastes, or that had possible spills of hazardous materials.

As a result of comprehensive assessments conducted under the 1986 Consent Order and Compliance Agreement signed by DOE, EPA and the U.S. Geological Survey, 368 potential waste units, ranging from fuel oil spills to pits containing radioactive contaminants, were identified. Early studies looked at sites routinely used to dispose of wastes, sites that were used occasionally, sites where accidental releases occurred, and areas thought to have been disturbed.

INEEL cleanup and the settlement agreement

In 1995, the DOE, the state of Idaho, and the U.S. Navy signed an agreement that outlines specific milestones DOE must achieve regarding wastes currently stored at the INEEL. If DOE violates the terms of the agreement, the state of Idaho can ask a federal judge to impose fines and prevent future DOE spent fuel shipments to Idaho. The agreement states that the DOE, the EPA, and the state of Idaho will continue to implement the Federal Facility Agreement and Consent Order in concert with the Superfund law.

Resource Conservation and Recovery Act

A federal law enacted in 1976 (and amended in 1980 and 1984) that regulates the generation, transportation, treatment, storage and disposal of hazardous wastes.

Consent Order and Compliance Agreement

An agreement signed in 1987 by the DOE, the EPA and the U.S. Geological Survey that addressed compliance with Resource Conservation and Recovery Act regulations governing the past and current land disposal of hazardous waste at the INEEL. As a result of comprehensive assessments, 368 potential waste sites were identified. The agreement has since been superseded by the Federal Facility Agreement and Consent Order

National Environmental Policy Act

Requires all federal agencies to assess potential environmental impacts of major proposed federal actions. These are actions that may significantly affect the quality of the human environment. DOE may prepare a categorical exclusion, an environmental assessment, or an environmental impact statement, depending upon the nature of a given project, or may integrate National Environmental Policy Act values into cleanup documents. It is DOE's policy to address these values in the cleanup process.